

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PARK AVENUE CONSULTING GROUP, INC.,

Plaintiff,

v.

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

NEWGOLD INC. AND FIRSTGOLD CORP.,

Civ. No. 08-CV-01850

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Peter H. Cooper, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

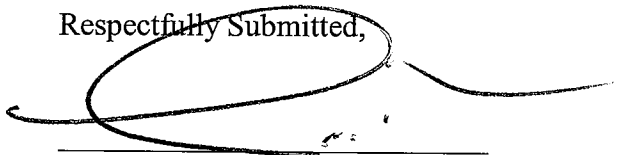
Applicants' Names:	John N. Blair J. Michael Lennon
Firm Name:	Blair & Roach LLP
Address:	2645 Sheridan Drive
City/State/Zip:	Tonawanda, New York 14150
Phone Number:	(716) 834-9181
Fax Number:	(716) 834-9197

John N. Blair is a member in good standing of the Bars of the State of New York and the State of Florida. J. Michael Lennon is a member in good standing of the Bar of the State of New York.

There are no pending disciplinary proceedings against John N. Blair or J. Michael Lennon in any State or Federal court.

Dated: New York, New York
March 4, 2008

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Peter H. Cooper", is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping tail that extends to the right.

Peter H. Cooper
SDNY Bar #: PHC4714
Biedermann, Reif, Hoenig & Ruff
570 Lexington Avenue, 16th Floor
New York, New York 10022
Phone Number: (212) 697-6555
Fax Number: (212) 986-3509

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PARK AVENUE CONSULTING GROUP, INC.,

Plaintiff,

v.

NEWGOLD INC. AND FIRSTGOLD CORP.,

Defendants.

**AFFIDAVIT OF PETER H.
COOPER IN SUPPORT
OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

Civ. No. 08-CV-01850

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

PETER H. COOPER, being duly sworn, hereby deposes and says as follows:

1. I am associated with Biedermann, Reif, Hoenig & Ruff, counsel for Defendants in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit John N. Blair and J. Michael Lennon as counsel pro hac vice to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with the Court.

3. I have known John N. Blair and J. Michael Lennon in the capacity of professional colleagues in the context of this matter.

4. Mr. Blair is the Managing Partner of Blair & Roach, LLP in Tonawanda, New York. He is a member in good standing of the Bars of the State of New York and the State of Florida. Certificates of good standing for Mr. Blair are attached as **Exhibit A**.

5. Mr. Lennon is an Associate Attorney at Blair & Roach, LLP. He is a member in good standing of the Bar of the State of New York. A certificate of good standing for Mr. Lennon is attached as **Exhibit B**.

6. I have found Mr. Blair and Mr. Lennon to be skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

7. Accordingly, I am pleased to move the admission of John N. Blair and J. Michael Lennon, pro hac vice. A proposed Order granting that admission is attached hereto as **Exhibit C**.

WHEREFORE, it is respectfully requested that the motion to admit John N. Blair and J. Michael Lennon, pro hac vice, to represent Defendants in the above-captioned matter, be granted.

Dated: New York, New York
March 4, 2008

Respectfully submitted,



Peter H. Cooper
SDNY Bar #: PHC4714

Exhibit A

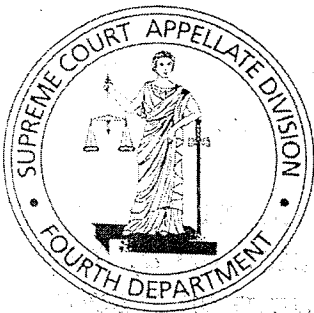
**SUPREME COURT OF
THE STATE OF NEW YORK
APPELLATE DIVISION, FOURTH DEPARTMENT
ROCHESTER, NEW YORK**

I, JOANN M. WAHL, Clerk of the Appellate Division of the Supreme Court in the Fourth Judicial Department, State of New York, do hereby certify that

JOHN NATHANIEL BLAIR

*was duly admitted to practice as an attorney and counselor at law in all courts of this state by this Court on, **February 20, 1973**, and appears in good standing upon the roll of attorneys and counselors, and other records, in this office and has registered with the administrative office of the Courts as required by Judiciary Law §468-a.*

IN WITNESS WHEREOF, I have
hereunto set my hand and affixed the
seal of this Court, at the City of
Rochester, February 22, 2008.



Joann M. Wahl

Clerk of the Court



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 546267
John N. Blair
2645 Sheridan Dr
Tonawanda, NY

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on April 18, 2002.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 22nd day of February, 2008.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/klf9:R10

Exhibit B

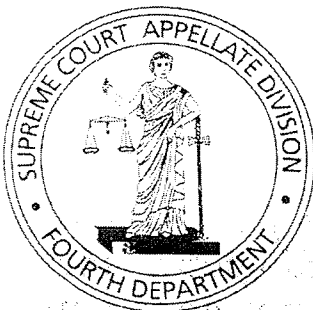
**SUPREME COURT OF
THE STATE OF NEW YORK
APPELLATE DIVISION, FOURTH DEPARTMENT
ROCHESTER, NEW YORK**

I, JOANN M. WAHL, Clerk of the Appellate Division of the Supreme Court in the Fourth Judicial Department, State of New York, do hereby certify that

JAMES MICHAEL LENNON

*was duly admitted to practice as an attorney and counselor at law in all courts of this state by this Court on, **February 27, 2004**, and appears in good standing upon the roll of attorneys and counselors, and other records, in this office and has registered with the administrative office of the Courts as required by Judiciary Law §468-a.*

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of this Court, at the City of Rochester, February 22, 2008.



Joann M. Wahl

Clerk of the Court

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PARK AVENUE CONSULTING GROUP, INC.,

Plaintiff,

v.

**ORDER FOR ADMISSION
PRO HAC VICE**

NEWGOLD INC. AND FIRSTGOLD CORP.,

Civ. No. 08-CV-01850

Defendants.

Upon the motion of Peter H. Cooper, attorney for Defendants Newgold Inc. and FirstGold Corp., and said sponsors attorney's Affidavit in support;

IT IS HEREBY ORDERED that:

Applicants' Names: John N. Blair
J. Michael Lennon
Firm Name: Blair & Roach LLP
Address: 2645 Sheridan Drive
City/State/Zip: Tonawanda, New York 14150
Phone Number: (716) 834-9181
Fax Number: (716) 834-9197
E-mail Address: jnblair@blair-roach.com
jmlennon@blair-roach.com

are admitted to practice pro hac vice as counsel for Defendants Newgold Inc. and FirstGold Corp. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: _____, 2008
New York, New York

United States District/Magistrate Judge

AFFIDAVIT OF SERVICE BY REGULAR MAIL

STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

Secora M. Edey-Brathwaite, being duly sworn deposes and says that deponent is not a party to the action, is over 18 years of age and resides in Kings County.

On March 4, 2008 deponent served the within **Motion to Admit Counsel Pro Hac Vice, Affidavit of Peter H. Cooper in Support of Motion** upon:

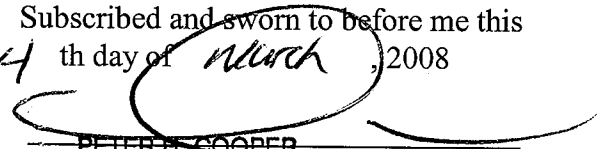
Levey, Filler, Rodriguez, Kelso & DeBianchi, LLP
41-26 27th Street, Suite 3D
Long Island City, New York 11101-3825

at the address designated by said attorneys for this purpose by depositing same enclosed in a post-paid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office within the State of New York.



Secora M. Edey-Brathwaite

Subscribed and sworn to before me this
4th day of March, 2008



PETER H. COOPER
Notary Public in the State of New York
No. 02CO5059941
Qualified in NEW YORK County
Commission Expires MAY 6, 2010